IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO.

: DATE FILED: April 4, 2002

v.

: VIOLATION: 21 U.S.C. § 841

ROBERT NOLL (Distribution of Controlled

: Substance- 1 Count)

: 26 U.S.C. § 7206(1) (Subscribing False Tax

: Return- 2 Counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 16, 1997, at Valley Forge, Pennsylvania, in the Eastern District of Pennsylvania, defendant

ROBERT NOLL

did knowingly and intentionally distribute, a mixture or substance containing a detectable amount of amphetamine, a Schedule III controlled substance.

In violation of Title 21, United States Code, Sections 841, and Title 18, United States Code, Section 2.

COUNT TWO

On or about February 19, 1996, in the Eastern District of Pennsylvania, the defendant,

ROBERT NOLL

a resident of Valley Forge, Pennsylvania, willfully made and subscribed a joint U.S. Individual Income Tax Return, IRS Form 1040, on behalf of himself and his spouse, that was verified by a written declaration that it was made under the penalties of perjury and was filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, which said joint U.S. Individual Income Tax Return he did not believe to be true and correct as to every material matter, in that line 22 of the return reported total income of \$65,772, whereas, as he then and there well knew and believed, he had income in excess of the amount reported.

In violation of Title 26, United States Code, Section 7206(1).

COUNT THREE

On or about March 4, 1997, in the Eastern District of Pennsylvania, the defendant,

ROBERT NOLL

a resident of Valley Forge, Pennsylvania, willfully made and subscribed a joint U.S. Individual Income Tax Return, IRS Form 1040, on behalf of himself and his spouse, that was verified by a written declaration that it was made under the penalties of perjury and was filed with the Director, Internal Revenue Service Center, at Philadelphia, Pennsylvania, which said joint U.S. Individual Income Tax Return he did not believe to be true and correct as to every material matter, in that the return reported total income of \$53,675, whereas, as he then and there well knew and believed, he had income in excess of the amount reported.

In violation of Title 26, United States Code, Section 7206(1).

A TRUE BILL

FOREPERSON	_

PATRICK L. MEEHAN